



U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101
MAR 19 1986

COPY

REPLY TO
ATTN OF: M/S 533

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Richard D. Zweig, General Manager
Chem-Security Systems, Inc.
Star Route Box 9
Arlington, Oregon 97812-9709

Re: Letter of Approval for PCB Disposal
Chem-Security Systems, Inc., Arlington, Oregon

Dear Mr. Zweig:

This letter's purpose is to modify the Environmental Protection Agency (EPA) Region 10's March 25, 1982, Letter of Approval (and its subsequent revisions) for polychlorinated biphenyl (PCB) disposal at Chem-Security Systems Inc.'s (CSSI) Arlington, Oregon facility.

In correspondence of February 27, 1986, CSSI requested that Special Condition 25(a) of the Letter of Approval be revised to require PCB detectability to 1.0 part per billion (ppb). Special Condition 25(a) currently requires a PCB detectability of 10 to 30 parts per trillion (ppt). As outlined in the February 27, 1986, correspondence and as discussed during a February 21, 1986, meeting with CSSI and EPA representatives, CSSI has not been able to achieve the 10 to 30 ppt detection limit without deviating from the analytical procedures required to be followed under Special Condition 27 of the Letter of Approval.

I have determined that Special Conditions 24 and 25, which specify detection limits, have potential for directly conflicting with Special Condition 27, which refers to 40 CFR Part 136 for designation of sampling methods and analytical procedures. To eliminate this potential conflict Special Conditions 24 and 25 will no longer specify detection limits.

Another conflict which became evident upon this reevaluation is that a sampling method and analytical procedure for total organic halogen is not included under 40 CFR Part 136, though Special Condition 27 refers to 40 CFR Part 136 as specifying a sampling method and analytical procedure for this parameter. Also, for the parameter total organic halogen to be consistent with the terminology used in available analytical procedures, it should have been referred to as total organic halide. To eliminate this conflict the parameter which was referred to in Special Conditions 24 and 25 as total organic halogen will be henceforth referred to as total organic halide. A sampling method and analytical procedure for this parameter will be specified under Special Condition 27.

EPA is hereby revising Special Conditions 24, 25 and 27, effective immediately as follows:

(24) (a) Observation wells shall be installed within the PCB portion of trenches at a site where the bottom of the PCB portion of the trench is at its lowest elevation. These observation wells shall extend to the bottom of the trench and shall be at least 4 inches in diameter and adequately perforated to collect fluids. (A leachate interceptor drain and collection system may be installed for the PCB disposal portion of Trench 5 and may be used in lieu of an observation well in this trench. The drain and system shall be adequate to collect liquids emanating from the PCB disposal portion of Trench 5.) The observation wells in the PCB disposal portion of trenches (and the leachate interceptor drain and collection system for Trench 5) shall be checked monthly for the presence of liquid. If greater than 50 cubic centimeters of liquid is detected, a sample shall be taken and analyzed for the following parameters:

1. PCBs
2. pH
3. Specific Conductance
4. Total Organic Halides
5. Chlorides

When monitoring shows that some liquid has accumulated in the bottom of a trench (or in the interceptor drain and collection system), it shall be ~~be~~ removed immediately by pumping or bailing. A contemporaneous written record shall be kept of the liquid volume and date of removal. Any liquid removed from the wells (or interceptor drain and collection system) shall be stored pursuant to this approval for subsequent incineration unless tested and found to contain less than 500 ppm PCBs.

(b) A ground water monitoring system shall be established which is adequate to monitor the uppermost aquifer underlying the site. At a minimum, this system shall consist of the following:

- (i) Monitoring well MW-1 as constructed and located shall be maintained.
- (ii) A monitoring well shall be constructed and maintained along the western perimeter of the facility, north of the bore hole described as B-1 (shown on Attachment B of the technical report submitted March 10, 1978, by Chem-Nuclear Systems, Inc.) but south of the anticline.
- (iii) A monitoring well shall be constructed and maintained at a location not more than 150 feet south of Trench 8 in an area near the midpoint of the southern boundary of Trench 8.

Construction of the wells required under (24)(b)(ii) and (iii) should proceed as described in the RCRA Part B permit application (page F-32, revision 0). In addition, monitoring wells shall be designed, constructed and maintained such that they reach the first monitorable zone. Monitoring wells shall be sampled monthly after construction. Samples shall be analyzed for the parameters listed in Special Condition (24)(a).

The static water level in each monitoring well shall be obtained prior to sampling each month for the first year after well installation and quarterly thereafter.

(25) The two ground water monitor wells (site water well and the office water well) shall be sampled monthly and analyzed for the following parameters:

- a. PCBs
- b. pH
- c. Specific Conductance
- d. Total Organic Halides

Samples from each well shall be taken from a point located between the well pump and pressure or storage tanks.

A written record of sampling and laboratory analysis results shall be maintained.

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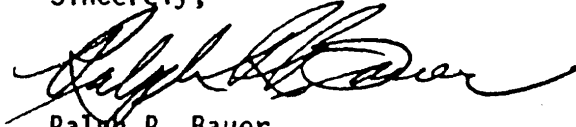
(27) Sampling methods and analytical procedures for the parameters required in Special Conditions 24 and 25, excepting total organic halide, shall be as specified in 40 CFR Part 136 as amended in 41 FR 52779 on December 1, 1976. Sampling methods and analytical procedures for total organic halide required in Special Conditions 24 and 25, shall be as specified in "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods", EPA Publication SW-846 [Second Edition, 1982 as amended by Update I (April, 1984), and Update II (April, 1985)]. In addition, any laboratory performing chemical (PCBs and total organic halide) tests for the operation of the disposal site shall be a participant in EPA's Performance Evaluation Sample Program for analytical quality control.

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Please note that today's modification of the March 25, 1982 Letter of Approval (and its subsequent revisions) in no way relieves CSSI of the regulatory and approval requirements for proper disposal of PCBs previously in effect.

All correspondence or inquiries on this matter should be directed to Catherine Massimino of my staff at (206) 442-4153.

Sincerely,

A handwritten signature in black ink, appearing to read "Ralph R. Bauer", written in a cursive style.

Ralph R. Bauer
Acting Regional Administrator

cc: J. Whitworth, DEQ
K. Lepic, CSSI